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# REGULATORY REQUIREMENTS FOR ENVIRONMENTAL CLEANUP AT THE FORMER WILLIAMS AFB

The Air Force, Environmental Protection Agency (EPA), and Arizona Department of Environmental Quality (ADEQ) have made excellent progress with the environmental cleanup program at the former Williams AFB, Mesa, AZ. At this time the cleanup is nearly complete and 94 percent of the former base property has been transferred for reuse.

The environmental cleanup started in 1983 when the active Williams AFB began work under the Air Force's Installation Restoration Program (IRP). The IRP is the means by which the Defense Department pays for Superfund type cleanups on military installations. The IRP uses federal legislation called the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and CERCLA regulations called the National Contingency Plan (NCP) to guide cleanups. In November of 1989, the EPA added Williams to the National Priority List and in September 1990 the Air Force, EPA, and State of Arizona established a Federal Facility Agreement to assist the environmental cleanup. William AFB closed in September 1993.

CERCLA and its regulations (the NCP) define an orderly cleanup process described in the tables below. The former Williams AFB has completed all of that cleanup process at almost all of its sites. The primary cleanup work that remains is being conducted at the Fuel Spill Site (ST012) and an old Pesticide/Paint Storage Site (SS017). At a third site, Fire Training Area 2 (FT002), the Air Force is amending the Record of Decision to impose deed restrictions on the property. The phases of CERCLA work to be completed at each of these sites are:

- Complete a Feasibility Study (ST012 and SS017 only)
- Publish a Proposed Plan
- Establish a Record of Decision
- Write a Remedial Action Work Plan
- Conduct a Remedial Action
- Write a Remedial Action Completion Report





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### MORE ON REGULATORY REQUIREMENTS

The Air Force continues to work with federal and state environmental officials to ensure the utmost safety for public health and the environment in cleanup work at the former Williams AFB. CERCLA is the primary federal law that guides Air Force cleanup and community involvement at Williams.

• CERCLA was made law in 1980 and was amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986. This law, generally known as Superfund, guides the environmental restoration of the former Williams AFB. It stipulates the processes and requirements for responding to environmental contamination caused by historically-accepted hazardous-waste management practices once used at Williams. SARA included provisions for the Defense Environmental Restoration Program

(DERP). The DERP deals with cleanups at active and closed installations through the Installation Restoration Program. The DERP guidance spells out the Defense Department's policies and procedures for complying with CERCLA requirements for its IRP.

#### STEPS IN THE PROCESS

The Installation Restoration Program is the Air Force's process for identifying and cleaning sites contaminated with oil or hazardous substances. The Air Force established the IRP to be consistent with CERCLA and its implementing regulations called the National Contingency Plan. These cleanup phases are described in the tables below. The tables show what phases have been completed at Williams and the phases to be completed for a couple of sites. At each step, the Air Force works with the EPA, ADEQ, and the public to ensure protection of public health and the environment as well as compliance with State and Federal laws for environmental cleanup and property transfer.

## Removal Actions may be used at any time in the CERCLA process to address urgent cleanup requirements.

Williams has used removal actions on a number of occasions to conduct cleanups. After a removal action is completed, the Air Force evaluates the effectiveness of the action to determine if any additional action is needed. Any additional action is stated in a formal Record of Decision (described below); otherwise the Record of Decision notes that no additional action is needed. The Air Force is conducting a removal action cleanup currently at both remaining cleanup sites: Fuel Storage Area and Pesticide/Paint Storage Site.

#### ENGINEERING EVALUATION/COST ANALYSIS (EE/CA)

If a site requires a removal action, an in-depth evaluation of potential short-term remedies for it must be stated in an Engineering Evaluation/Cost Analysis. Following a public comment period on the EE/CA, the Air Force writes an Action Memorandum to conduct the removal action.





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#### **REMOVAL ACTION**

This short-term cleanup action is designed to immediately clean up a potential threat to human health or the environment. The removal action must be consistent with final remedy at the site. If it is a fully effective cleanup action, the final Record of Decision (below) may state that no additional action is needed. Otherwise, the Record of Decision states what additional action is needed.

The following phases of the CERCLA process have been completed at the former Williams AFB:

#### PRELIMINARY ASSESSMENT (PA)

Records were searched as the first step in the investigative process to find possible locations of potentially hazardous disposal areas. This assessment included employee interviews and reviews of reports, installation records and technical data.

#### SITE INSPECTION (SI)

Sites recommended in a PA were inspected to confirm the presence of contaminants. Site inspections were achieved through a combination of visual inspections and limited sampling of soil or groundwater to confirm the presence of oil or contaminants. Following such inspections, the Air Force, EPA and ADEQ, recommended whether the site required further study in a Remedial Investigation (described below) or if the site should be classified for "no further action."

#### REMEDIAL INVESTIGATION (RI)

A detailed examination of soils and waters to determine the concentrations of contaminants, direction of movement, and extent of contamination. A risk assessment is conducted as part of the remedial investigation to help establish cleanup levels.

Only three out of a total of 32 sites at Williams require work in the following CERCLA process phases: Fuel Storage Area, Pesticide/Paint Storage Site, and Fire Training Area 2.

#### FEASIBILITY STUDY (FS)

Using data gathered in the Remedial Investigation, the Feasibility Study develops and analyzes various final cleanup alternatives and provides recommendations for appropriate actions.

#### PROPOSED PLAN (PP)

Once the Feasibility Study is complete, the Air Force proposes what it believes to be the best alternative to clean up the site. The Proposed Plan summarizes remedial alternatives in the feasibility study; and explains why the base prefers the designated alternative. The Air Force holds a public comment period and a public meeting when the proposed plan is issued.

#### RECORD OF DECISION (ROD)

The Record of Decision provides a brief summary of facts and analysis supporting selection of the chosen remedial action. The ROD must also show how the selected remedy meets the statutory requirements under CERCLA. Also included in the ROD are responses to comments taken during the public comment period.





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#### REMEDIAL DESIGN (RD)

Once the ROD is finalized, engineers design the cleanup system. Simple designs are sometimes included in a Remedial Action Work Plan, and no distinct Remedial Design phase is conducted.

#### REMEDIAL ACTION (RA)

During this phase, construction and operation of cleanup actions takes place.

#### LONG-TERM MONITORING (LTM)

The phase of water, soil, or sediment analysis conducted over a period of time that tracks the effectiveness of a cleanup system. Long-term monitoring may be required to ensure that contaminants that remain in place do not migrate and pose a threat to public health or the environment.

All sites at the former base will undergo delisting from EPA's National Priority List.

#### DELISTING

Once the Air Force, regulatory agencies, and the public agree that all the cleanup goals have been completed, the former base may be taken off of EPA's National Priority List. The Air Force plans to request that most of the former base be delisted from the NPL after all Records of Decision are in place.

**Community involvement** is an important part of the Air Force cleanup program. The table below shows how the Air Force will solicit community involvement in each of the remaining phases of the CERCLA cleanup at Williams.

Community involvement tools the Air Force uses for remaining work at the former Williams AFB	Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Requirements			
	Feasibility Study	Proposed Plan	Record of Decision (ROD)	Remedial Action
Maintain cleanup information in the Administrative Record at the Mesa Public Library	√	V	√	√
Present status reports to the Restoration Advisory Board (RAB) and residents in the local community	V	V	√	V
Publish technical fact sheets and press releases for distribution to the public and local officials	V	<b>√</b>	√	√
Publish public notices in local newspapers		√		
Announce public comment periods		√		
Hold public meetings		√		